

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FREE HOLDINGS INC.,

Plaintiff,

v.

KEVIN McCOY and SOTHEBY'S INC.,

Defendants.

Case No. 1:22-cv-00881 (LGS) (JLC)

**DECLARATION OF WILLIAM L.
CHARRON IN SUPPORT OF
DEFENDANT KEVIN McCOY'S
MOTION TO DISMISS PLAINTIFF'S
AMENDED COMPLAINT**

WILLIAM L. CHARRON, declares under penalty of perjury as follows:


1. I am a member of Pryor Cashman LLP, attorneys for defendant Kevin McCoy ("McCoy") in the above-captioned action. I respectfully submit this Declaration in support of McCoy's motion to dismiss the Amended Complaint filed by plaintiff Free Holdings Inc. ("Plaintiff"), pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6).

2. Annexed hereto as **Exhibit A** is a true and correct copy of a printout of the Namecoin "FAQ" page from Namecoin's website, <https://www.namecoin.org/docs/faq/> (last accessed on June 28, 2022), which is referenced at paragraphs 35, 39 and 40 of Plaintiff's Amended Complaint (ECF No. 47).

3. Annexed hereto as **Exhibit B** is a true and correct copy of the printout of the website, <https://namebrow.se/name/d41b8540cbacdf1467cdc5d17316dcb672c8b43235fa16cde98e79825b68709a/> (last accessed on June 28, 2022), which is referenced at footnote 3 to paragraph 38 of Plaintiff's Amended Complaint (ECF No. 47).

I declare under penalty of perjury that the foregoing is true and correct.

Executed: New York, New York
June 30, 2022

By: 
William L. Charron

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